

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re

CUSTOMS AND TAX ADMINISTRATION OF
THE KINGDOM OF DENMARK
(SKATTEFORVALTNINGEN) TAX REFUND
SCHEME LITIGATION

MASTER DOCKET

18-md-02865-LAK

This document relates to: All cases.

**MOTION FOR THE ISSUANCE OF AN ORDER PROHIBITING THE
DEPOSITION OF NIGEL RACKHAM**

PLEASE TAKE NOTICE that the undersigned Lead Counsel for the defendants in the above-captioned matter (collectively, “Defendants”), will apply before the Honorable Lewis A. Kaplan of the Southern District of New York at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York, Courtroom 21B, at a time and date to be determined by the Court, for an order pursuant to Rules 16, 26, and 37 of the Federal Rules of Civil Procedure, as well as pursuant to the Court’s inherent authority, for the issuance of an order prohibiting Plaintiff Skatteforvaltningen from deposing Nigel Rackham, or, in the alternative, excluding from evidence in this matter any testimony from such a deposition. In support of this motion, Defendants rely upon the accompanying Memorandum of Law and Declaration of Nicholas S. Bahnsen dated August 5, 2021, and the exhibits attached thereto.

Dated: New York, New York
August 5, 2021

Respectfully submitted,

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